

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DECLARATION OF JENNIFER D. CARDELUS IN SUPPORT OF DEFENDANTS’
REPLY IN SUPPORT OF DEFENDANTS’ MOTION TO EXCLUDE LACEY
KELLER’S OPINIONS AND PROPOSED TESTIMONY**

I, Jennifer D. Cardelus, declare as follows:

1. I am an attorney at O’Melveny & Myers, counsel for O’Melveny & Myers LLP and counsel of record for Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively “Janssen”) in the above captioned case.

2. I submit this declaration in support of Defendants’ Janssen and Johnson & Johnson’s Omnibus Motions in Limine.

3. Attached as Exhibit 1 is a true and correct copy of a document produced in this litigation, Bates stamped SUMMIT_002054174-4209.

4. Attached as Exhibit 2 is a true and correct copy of a portion of the deposition transcript of Ron R. Kuntz, taken on January 23, 2019.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed in Los Angeles, California on September 25, 2019.

/s/ Jennifer D. Cardelus

Jennifer D. Cardelus

CERTIFICATE OF SERVICE

I hereby certify that on September 25, 2019, a copy of the foregoing **DECLARATION IN SUPPORT OF JANSSEN AND JOHNSON & JOHNSON DEFENDANTS' OMNIBUS MOTIONS IN LIMINE** was served electronically on the parties.

Dated: September 25, 2019

/s/ Jennifer D. Cardelus
Jennifer D. Cardelus
O'MELVENY & MYERS LLP
400 S. Hope Street
Los Angeles, CA 90071
Telephone: (213) 430-6000
Facsimile: (213) 430-6407
jcardelus@omm.com

*Attorney for Defendants Janssen
Pharmaceuticals, Inc., Johnson &
Johnson, Janssen Pharmaceutica, Inc.
n/k/a Janssen Pharmaceuticals, Inc., and
Ortho-McNeil-Janssen Pharmaceuticals,
Inc. n/k/a Janssen Pharmaceuticals, Inc.*